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Hearing Date: July 11, 2019
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SEARS HOLDINGS CORPORATION, INC.,

Chapter 11

Debtors.

Case No. 18-23538 (RDD)

-X

**DEBTOR'S NOTICE OF MOTION FOR AN ORDER PURSUANT TO 11 U.S.C. § 503
(i) GRANTING AN ADMINISTRATIVE CLAIM; (ii) COMPELLING THE
IMMEDIATE PAYMENT OF THE ADMINISTRATIVE EXPENSE CLAIM FOR
SERVICES RENDERED BY M&S LANDSCAPING INC. AND INCURRED BY
THE DEBTOR POST-PETITION; AND (iii) FOR SUCH OTHER AND FURTHER
RELIEF THE COURT DEEMS APPROPRIATE**

PLEASE TAKE NOTICE, that on July 11, 2019, at 10:00 a.m., a hearing will be held before the Honorable Robert D. Drain at the United States Court House located at 300 Quarropas Street, White Plains, New York in the Chapter 11 case of SEARS HOLDINGS CORPORAITON, INC., the debtors and the debtors-in-possession (“Debtors”) on M&S Landscaping Inc.’s motion (the “Motion”) for an order (i) granting an administrative claim; (ii) compelling the immediate payment of such Administrative Expense Claim; and (iii) for such other and further relief the court deems appropriate.

FURTHER NOTICE, objections to the Motion shall be filed with the Clerk of the Bankruptcy Court by not later than 5:00 p.m. seven (7) days before the hearing date, and shall state the name of the objecting party, whether the objecting party is a creditor, the amount of

its claim or interest, and the nature and basis of the objection. The objection shall be served upon (i) Bronson Law Offices, P.C., 480 Mamaroneck Ave., Harrison, NY 10528, (ii) the Office of the United States Trustee, 201 Varick Street, Suite 1006, New York, NY 10014, with a copy to (iii) the Court.

Dated: Harrison, New York
June 19, 2019

BRONSON LAW OFFICES, P.C.
Counsel for M&S Landscaping, Inc.

By: /s/ H. Bruce Bronson
H. Bruce Bronson